

Submitted by
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U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ

2019 JUN 25 P 2:22

JEANNE A. RAUGHTON

BY: B. J.
DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY
402 East Trenton Street
Trenton, NJ 08608

IN RE: LARRY J. KUSHNER and
JACQUELINE KUSHNER
731 GREENS AVE
LONG BRANCH, NJ 07740

CASE NO. 18-33285-CMG
CHAPTER 13
Judge Christine M. Gravelle

Soc. Sec. No. xxx-xx-5977
Soc. Sec No. xxx-xx-5868

**DEBTOR'S MOTION FOR AN ORDER CONVERTING THIS
CASE TO A CHAPTER 11**

The Debtors, Larry J. Kushner and Jacqueline Kushner hereby
apply for the entry of an Order to deny trustees motion to dismiss this
case and converting this case to a Chapter 11:

JURISDICTION AND VENUE

1. The Debtor filed a Voluntary Petition in this Court on

November 27, 2018 for relief under Chapter 13. This Petition was assigned the above number and assigned to Judge Christine Gravelle.

2. The Court has jurisdiction to consider this application under 28 USC Sec. 157 and 1334. This is a core proceeding. Venue is Proper under 28 USC Sec. 1408 and 1409.

3. This application is under the Federal Rules of Bank. Practice Sections 1007 and related statutes, as well as the Local Rules.

FACTUAL BACKGROUND

4. Debtors are individuals residing and seven together with (7) of their 13 children in Long Branch, New Jersey.

5. This Petition was filed on November 27, 2018.

6. This matter is scheduled for confirmation on June 25, 2019.

7. Debtor Larry Kushner suffered stroke and was hospitalized on April 22, 2019.

8. This debtor is now functioning but needs more time to hire an attorney and address the issues raised in the trustee's objections and those of a creditor.

9. Debtors ask that this matter be adjourned as a final adjournment for one month.

10. One of the trustee's objections dealt with financial limitations set for a chapter 13.

11. If the Court does not grant an adjournment the debtors
Request that this matter be converted to a Chapter 11
proceeding.

RELIEF REQUESTED AND REASONS

12. As set forth above for medical reasons this debtor seeks a
Continuance.

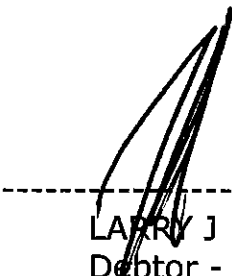
13. If the court sees merit in the objection about the debtors
qualifying for this chapter debtor seeks conversion to Chapter 11

PRIOR REQUESTS

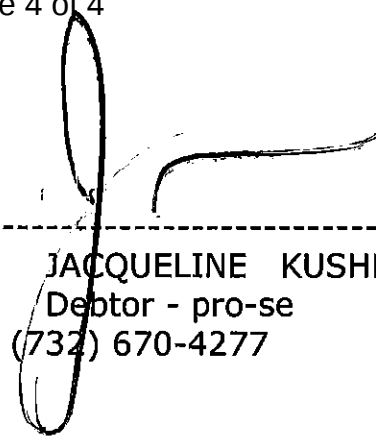
14. No prior request were made in this matter to convert this
bankruptcy to Chapter 11.

WHEREFORE, the Debtor states under penalty of perjury that the
Contents of this Application is true and correct, and the debtor
respectfully requests a thirty (30) continuance of this matter or
conversion to a chapter 11.

June 25, 2019




LARRY J KUSHNER,
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(732) 670-6703



JACQUELINE KUSHNER,
Debtor - pro-se
(732) 670-4277

I HEREBY CERTIFY that true copy of this Motion was served by mail on all parties and on the standing Trustee, Andrew Russo, at CN 4853, Trenton NJ 08650.

June 25, 2019



LARRY J KUSHNER,
Debtor - pro-se
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